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Re-evaluation Note

REV2010-05

Call for Risk Management Proposals for Heavy Duty Wood Preservatives (Creosote, Pentachlorophenol, Chromated Copper Arsenate and Ammoniacal Copper Zinc Arsenate)

(publié aussi en français)

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The Proposed Re-evaluation Decision document for heavy duty wood preservatives (HDWPs) (PRVD2010-03), proposes the development of a Risk Management Plan for HDWPs to further mitigate occupational risks from HDWPs.

This Re-evaluation Note invites stakeholders to propose risk management measures, and related comments, for consideration in the development of a HDWP Risk Management Plan. These proposals should consist of measures that could potentially minimize risks to those working with HDWPs. This would be achieved by making all reasonable efforts to limit worker exposure levels to the lowest practical levels.

The PMRA recognizes significant achievements that have been made within the Canadian industry to date, via the development and implementation of Recommendations for the design and operation of wood preservation facilities, technical recommendations document (TRD). In developing a risk management plan, the PMRA will endeavour to work within the framework of the TRD and build on these existing efforts where possible.

Possible elements of a HDWP Risk Management Plan may include, but are not limited to, the following:

- Establish the TRD as a “living” or “evergreen” document, with defined timelines for periodic review and improvement.
- A comprehensive review of U.S. mitigation measures (as identified in the USEPA HDWP RED documents), for comparison with the Canadian TRD. Followed by inclusion of any significant measures not currently addressed by the TRD.
- Phase in of additional engineering controls and “best available technology” within wood treatment facilities.
- Worker rotation schedules designed to limit time spent in occupational activities involving higher exposure to HDWP chemicals, and additional analysis of worker practices.
- Mandatory biomonitoring of workers and air monitoring in treatment facilities (to establish potential for exposure, since adoption of TRD).
- Review of current air monitoring values, as established by occupational health and safety authorities (e.g. threshold limit values, permissible exposure levels).
- Coordination of regulatory and risk management activities between PMRA and other federal, provincial and territorial regulatory authorities.
- Establish adherence with the TRD as a provincial licensing requirement for treatment facilities.
- Long-term development of alternatives to currently available HDWPs.

- Periodic monitoring of the risk management plan by PMRA and other regulatory authorities, in conjunction with industry, to assess the adoption of, and effectiveness of risk reduction measures.

The PMRA will accept written comments on this consultation up to 60 days from the date of publication of this document. Please forward all comments to PMRA Publications (please see contact information on the cover page of this document).